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NEI 99-04 (SECY-00-0045)

RS-20-015
NMP1L3327
JAFP-20-0013
TMI-20-0004

January 31, 2020

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Braidwood Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-72 and NPF-77
NRC Docket Nos. STN 50-456 and STN 50-457

Byron Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-37 and NPF-66
NRC Docket Nos. STN 50-454 and STN 50-455

Calvert Cliffs Nuclear Power Plant, Units 1 and 2
Renewed Facility Operating License Nos. DPR-53 and DPR-69
NRC Docket Nos. 50-317 and 50-318

Clinton Power Station, Unit 1
Facility Operating License No. NPF-62
NRC Docket No. 50-461

Dresden Nuclear Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-237 and 50-249

James A. FitzPatrick Nuclear Power Plant
Renewed Facility Operating License No. DPR-59
Docket No. 50-333

LaSalle County Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Limerick Generating Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-39 and NPF-85
NRC Docket Nos. 50-352 and 50-353

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Nine Mile Point Nuclear Station, Units 1 and 2
Renewed Facility Operating License Nos. DPR-63 and NPF-69
NRC Docket Nos. 50-220 and 50-410

Peach Bottom Atomic Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-44 and DPR-56
NRC Docket Nos. 50-277 and 50-278

Quad Cities Nuclear Power Station, Units 1 and 2
Renewed Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket Nos. 50-254 and 50-265

R.E. Ginna Nuclear Power Plant
Renewed Facility Operating License No. DPR-18
NRC Docket No. 50-244

Three Mile Island Nuclear Station, Unit 1
Renewed Facility Operating License No. DPR-50
NRC Docket No. 50-289

Subject: Exelon Generation Company, LLC 2019 Corporate Regulatory Commitment
Change Summary Report

This letter submits the subject commitment change summary report for the Exelon Generation Company, LLC (Exelon) stations listed for certain corporate-related commitment changes processed during the period from January 1, 2019, through December 31, 2019. Summaries of the commitment changes requiring NRC notification are contained in the attachment.

There are no new regulatory commitments contained in this letter. If you have any questions concerning this letter, please contact Richard Gropp at (610) 765-5557.

Respectfully,



David P. Helker
Sr. Manager, Licensing
Exelon Generation Company, LLC

Attachment: Exelon Generation Company, LLC 2019 Corporate Regulatory Commitment
Change Summary Report

Attachment
Exelon Generation Company, LLC
2019 Corporate Regulatory Commitment Change Summary Report
Page 1 of 10

- **Commitment Change Tracking Number: 2019-01**

Source Document:

Letter from Keith R. Jury (Exelon) to U.S. NRC, "RS-12-185 - Exelon Generation Company, LLC's Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding the Emergency Communications Aspects of Recommendation 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident," dated October 31, 2012. (Commitment Tracking Item 1362747-59)

Original Commitment:

Create communications strategy document that will meet the requirements of Nuclear Energy Institute (NEI) 12-01, "Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities," Step 4.7.

Subject of Change:

The method for implementing the committed actions associated with the emergency communication strategy are not being eliminated, but rather relocated from Exelon document BDBECS-1106, "BDBEE Communications Strategy and Equipment Readiness," to Procedure CC-AA-118, "Diverse and Flexible Coping Strategies (FLEX), Spent Fuel Pool Instrumentation (SFPI), and Hardened Containment Vent System (HCVS) Program Document."

Revised Commitment:

Although the committed actions are not being eliminated, Exelon Generation Company, LLC (Exelon) will no longer track the action as a regulatory commitment per Exelon's commitment management process. The aspects of this commitment have now been codified under the requirements of 10 CFR 50.155, "Mitigation of beyond-design-basis events," and are now considered an "obligation."

Basis:

Since the aspects of the committed action (i.e., maintaining emergency communication capability) have been codified under the provisions of 10 CFR 50.155, and are considered an "obligation," tracking this action as a regulatory commitment under the commitment management process no longer applies. Per the guidance in NEI 99-04, "Guidelines for Managing NRC Commitment Changes," an "obligation" refers to any condition or action that is a legally binding requirement imposed on licensees through applicable rules, regulations, orders, and licenses (including technical specifications and license conditions). Therefore, by definition, in accordance with Exelon's commitment management process the action can be eliminated as a regulatory commitment. Any future changes will be evaluated pursuant to the requirements of 10 CFR 50.155(f).

There is no adverse regulatory impact anticipated regarding how the committed actions are tracked, since they will continue to be maintained. The committed actions are now considered as "obligations."

Attachment
Exelon Generation Company, LLC
2019 Corporate Regulatory Commitment Change Summary Report
Page 2 of 10

- **Commitment Change Tracking Number: 2019-02**

Source Document:

Letter from Patrick R. Simpson (Exelon Generation Company, LLC) to the U.S. NRC, "RS 12-037 - Response to Request for Information Regarding Thermal Conductivity Degradation and 10 CFR 50.46 Report," dated March 19, 2012 (Commitment Tracking Item 1342643-01, 02, -03, and -04)

Original Commitment:

EGC [Exelon Generation Company, LLC] will submit to the NRC for review and approval a LBLOCA [large break loss of coolant accident (LBLOCA)] analysis that applies NRC approved methods that include the effects of fuel [thermal conductivity degradation (TCD)] TCD for Braidwood Station, Unit 2 and Byron Station, Unit 2. The date for the analysis submittal is contingent on the following milestones which must be completed in order to perform a revised licensing basis LBLOCA analysis with an NRC approved [emergency core cooling system (ECCS)] ECCS evaluation model that explicitly accounts for TCD:

- 1) NRC approval of a fuel performance analysis methodology that includes the effects of TCD. The new methodology for developing inputs to the LBLOCA evaluation model would replace the current licensing basis methodology for Braidwood Station, Unit 2 and Byron Station, Unit 2 that is described in WCAP-15063-P-A, Revision 1 with Errata, "Westinghouse Improved Performance Analysis and Design Model (PAD 4.0)."
- 2) NRC approval of a LBLOCA evaluation model that includes the effects of TCD. The new methodology would replace the current licensing basis methodology, WCAP-16009-P-A, "Realistic Large-Break LOCA Evaluation Methodology Using the Automated Statistical Treatment of Uncertainty Method (ASTRUM)."

The commitment date is two years after completion of Items 1) and 2).

Subject of Change:

The subject of this commitment change is a change in schedule for the committed actions.

Revised Commitment:

The new date for the completion of items 1) and 2) is March 28, 2020.

Basis:

The current committed date is two years after the completion of the LOCA methodology (FSLOCA approved with ML17226A225) and supporting codes (PAD5 approved with ML17100A921). The later of those two occurred on September 28, 2017, resulting in a commitment date of September 28, 2019. The justification for this change is due to late schedule delays in receiving final vendor deliverables which leaves EGC insufficient time to prepare and transmit a license amendment request by the committed date. The two errors

Attachment
Exelon Generation Company, LLC
2019 Corporate Regulatory Commitment Change Summary Report
Page 3 of 10

are documented in the Exelon Corrective Action Program (i.e., IR 4252295 and IR 4264418) each causing delays of approximately six (6) weeks to the deliverables. In order to avoid competition with fall outage tasks, a new commitment date of March 28, 2020, has been selected.

There is no adverse regulatory impact associated with this change. The commitment to perform and submit new LBLOCA analyses at the earliest possible time remains. The existing design basis within the Braidwood and Byron Station Updated Final Safety Analysis Report (UFSAR), Chapter 15.6, "Decrease in Reactor Coolant Inventory," remains accurate and acceptable. The change in commitment date is to accommodate delays by the vendor in delivering final products and to ensure an error free LAR is submitted.

Attachment
Exelon Generation Company, LLC
2019 Corporate Regulatory Commitment Change Summary Report
Page 4 of 10

- **Commitment Change Tracking Number: 2019-03**

Source Documents:

Letter from James Barstow, Exelon Generation Company, LLC to U.S. Nuclear Regulatory Commission - "Exelon Generation Company, LLC Fleet Commitment to Maintain Severe Accident Management Guidelines," dated December 4, 2015 (Correspondence Nos. RS-15-285, RA-15-089, and TMI-15-120). (Commitment Tracking Item 2611012)

Original Commitment:

For the applicable sites, the commitment stated:

SAMGs will be updated to future revisions of the BWROG or PWROG generic severe accident technical guidelines, and the SAMGs will be integrated with other emergency response guideline sets and symptom-based Emergency Operating Procedures, and validated, using the guidance in NEI 14-01, Emergency Response Procedures and Guidelines for Beyond Design Basis Events and Severe Accidents.¹

¹ Use of NEI 14-01 guidance begins with the update to revision 4 of the BWROG generic severe accident guidelines.

Subject of Change:

Revised commitment to remove reference to Nuclear Energy Institute (NEI) guidance document NEI 14-01, "*Emergency Response Procedures and Guidelines for Beyond Design Basis Events and Severe Accidents.*"

Revised Commitment:

As noted above, reference to NEI 14-01 is being removed from the commitment and the commitment has been modified as follows:

SAMGs will be updated to future revisions of the BWROG or PWROG generic severe accident technical guidelines.

Basis:

Based on the scope of the changes promulgated in the 10 CFR 50.155 rulemaking (i.e., 84FR39684, dated August 9, 2019), the NRC did not endorse the guidance provided in NEI 14-01.

On May 31, 2019, the NEI Nuclear Strategic Initiatives Advisory Committee (NSIAC) approved Revision 1 to the Severe Accident Management Guidelines (SAMG) Initiative. The revised guidance removed the reference to NEI 14-01 as the recently approved Mitigation of Beyond Design Basis Events Rule (i.e., 10 CFR 50.155) does not reference NEI 14-01 and the Pressurized Water Reactor Owner's Group (PWROG) and Boiling Water Reactor Owner's Group (BWROG) technical guidance is sufficient to support integration and validation of site-specific SAMGs.

Attachment
Exelon Generation Company, LLC
2019 Corporate Regulatory Commitment Change Summary Report
Page 5 of 10

Subsequently, by letter dated September 11, 2019, NEI issued guidance requesting that each operating plant licensee evaluate their site-specific commitment to assess the need to revise commitments originally made to the NRC concerning the SAMG Initiative. Accordingly, Exelon has completed this evaluation and has revised its commitment related to the SAMG Initiative and removed the reference to NEI 14-01.

There is no adverse regulatory impact anticipated from modifying the commitment. This commitment change is consistent with the industry's approach as approved by NEI's NSIAC and is consistent with NRC regulations and regulatory guidance associated with implementing 10 CFR 50.155.

Attachment
Exelon Generation Company, LLC
2019 Corporate Regulatory Commitment Change Summary Report
Page 6 of 10

- **Commitment Change Tracking Number: 2019-04**

Source Documents:

Exelon's response to NRC Order EA-02-026, "Order for Interim Safeguards and Security Compensatory Measures," dated February 25, 2002. (Commitment Tracking Items 451564-32 and 455060-07)

Original Commitment:

The specific commitment contained "security-related" information and is not reiterated below but involved including emergency interface information as required in NRC Order EA-02-026 pertaining to Interim Safeguards and Security Measures, dated February 25, 2002.

Subject of Change:

Commitment references to the emergency interface were deleted from Security Procedure SY-AA-101-133, since the actions are now governed by regulation.

Revised Commitment:

The commitment references were deleted from the applicable procedure.

Basis:

This commitment was a result of NRC Order EA-02-026, "Order for Interim Safeguards and Security Compensatory Measures," dated February 25, 2002. The affected section of this Order was B.5.b. No further details are being provided due to the "security-related" nature of the content. A letter dated May 3, 2019, was issued by the NRC. The subject of the letter is "Withdrawal of Certain Power Reactor Security Orders Applicable to Nuclear Power Plants." This letter discusses Order EA-02-026 and the partial withdrawal of certain requirements. The May 3, 2019, letter states: "Therefore, the NRC staff determined that the generically applicable security requirements set forth in the orders were adequately captured in the applicable NRC regulations, ... while the requirements of order EA-02-026 were withdrawn in part. Specifically, all requirements in order EA-02-026 were withdrawn except Requirements B.1.a, B.5.d, and B.5.e." The letter goes on to state: "The three requirements in order EA-02-026 that were not previously withdrawn had not been completely captured in regulations following the 2009 rulemaking."

As noted in the NRC's letter, the B.5.b requirements were withdrawn from Order EA-02-026 and the associated B.5.b requirements have been captured in 10 CFR 50.155. Based on this information, the commitment being tracked under 451564-32 can be removed/deleted from Procedure SY-AA-101-133.

There is no adverse regulatory impact anticipated with deleting this commitment, since Section B.5.b of the Order has been withdrawn and the requirements are now included as part of NRC regulations and by definition would constitute being an "obligation."

Attachment
Exelon Generation Company, LLC
2019 Corporate Regulatory Commitment Change Summary Report
Page 7 of 10

- **Commitment Change Tracking Number: 2019-05**

Source Documents:

Exelon's response to NRC Order EA-02-026, "Order for Interim Safeguards and Security Compensatory Measures," dated February 25, 2002.

Original Commitment:

The specific commitment contained "security-related" information and is not reiterated below but involved implementing a duress notification or equipment bypass to badging and biometric control stations located outside of the Protected Area (PA) to prevent unauthorized bypass of the access control system as required in the NRC Order EA-02-026 pertaining to Interim Safeguards and Security Measures, dated February 25, 2002.

Subject of Change:

Commitment references related to a duress notification or equipment bypass to affected badging and biometric control stations were deleted from Security Procedure SY-AA-103-514, since the actions are now governed by regulation.

Revised Commitment:

The commitment references were deleted from the applicable procedure.

Basis:

Nuclear Energy Institute (NEI) document NEI 03-12, "Security Plan, Training and Qualification Plan, Safeguards Contingency Plan and Independent Spent Fuel Storage Installations," is the document that contains the licensee commitment to the NRC for maintaining compliance with the regulations. NEI 03-012 contains the requirement for the duress notification or equipment bypass to badging and biometric controls located outside of the PA. This requirement is found in the last paragraph of Section 14.3 of the document (due to the "security-related" nature of the information the exact wording cannot be included). NEI 03-12, provides the template information and cannot be changed by the licensee without prior NRC approval.

There is no potential adverse impact. NEI 03-12 provides the template used by licensees to ensure the Security Plan meets regulatory requirements. Exelon adheres to the guidance in NEI 03-12, Section 14.3, and this template information cannot be changed by the licensee without prior NRC approval.

Attachment
Exelon Generation Company, LLC
2019 Corporate Regulatory Commitment Change Summary Report
Page 8 of 10

- **Commitment Change Tracking Number: 2019-06**

Source Documents:

Exelon's response to NRC Order EA-02-026, "Order for Interim Safeguards and Security Compensatory Measures," dated February 25, 2002. (Commitment Tracking Item 319367-45)

Original Commitment:

The specific commitment contained "security-related" information and is not reiterated below but involved revising Security Procedure SY-AA-101-133 to include emergency interface information.

Subject of Change:

The commitment reference was deleted from Security Procedure SY-AA-101-133, since the actions are now governed by regulation.

Revised Commitment:

The commitment referenced in the applicable procedure was deleted.

Basis:

This commitment was a result of Order EA-02-026, "*Order for Interim Safeguards and Security Compensatory Measures*," dated February 25, 2002. The affected section of this Order was B.5.b. No further details can be given due to SGI content. A letter dated May 3, 2019, was issued from the NRC. The subject of the letter is "Withdrawal of Certain Power Reactor Security Orders Applicable to Nuclear Power Plants." This letter addresses Order EA-02-026 and the partial withdrawal of certain requirements. The May 3, 2019, letter states: "Therefore, the NRC staff determined that the generically applicable security requirements set forth in the orders were adequately captured in the applicable NRC regulations, ... while the requirements of order EA-02-026 were withdrawn in part. Specifically, all requirements in order EA-02-026 were withdrawn except Requirements B.1.a, B.5.d, and B.5.e." The letter goes on to say: "The three requirements in order EA-02-026 that were not previously withdrawn had not been completely captured in regulations following the 2009 rulemaking."

As noted in the NRC's letter, the B.5.b requirements were withdrawn from Order EA-02-026 and the associated B.5.b requirements have been captured in 10 CFR 50.155. Based on this information, the commitment being tracked under 319367-45 can be removed/deleted from Procedure SY-AA-101-133.

There is no adverse regulatory impact anticipated with deleting this commitment, since Section B.5.b of the Order has been withdrawn and the requirements are now included as part of NRC regulations and by definition would constitute being an "obligation."

Attachment
Exelon Generation Company, LLC
2019 Corporate Regulatory Commitment Change Summary Report
Page 9 of 10

- **Commitment Change Tracking Number: 2019-07**

Source Documents:

Exelon's response to NRC Order EA-02-026, "*Order for Interim Safeguards and Security Compensatory Measures*," dated February 25, 2002. (Commitment Tracking Item 1185143-01)

Original Commitment:

The specific commitment contained "security-related" information and is not reiterated below but involved developing hostage training and providing the training periodically to the necessary personnel as required in the NRC Order EA-02-026 pertaining to Interim Safeguards and Security Measures, dated February 25, 2002.

Subject of Change:

The commitment reference was deleted from Security Procedure SY-AA-101-132, since the actions are now governed by regulation.

Revised Commitment:

The commitment referenced in the applicable procedure was deleted.

Basis:

This commitment resulted from NRC Order EA-02-026, "*Order for Interim Safeguards and Security Compensatory Measures*," dated February 25, 2002. The section of this Order was B.3.e. No further details can be given due to SGI content. By letter dated May 3, 2019, the NRC issued a letter, the subject of which is "*Withdrawal of Certain Power Reactor Security Orders Applicable to Nuclear Power Plants*." This letter addresses Order EA-02-026 and the partial withdrawal of requirements. The May 3, 2019, letter states: "Therefore, the NRC staff determined that the generically applicable security requirements set forth in the orders were adequately captured in the applicable NRC regulations, ... while the requirements of order EA-02-026 were withdrawn in part. Specifically, all requirements in order EA-02-026 were withdrawn except Requirements B.1.a, B.5.d, and B.5.e." The letter goes on to say: "The three requirements in order EA-02-026 that were not previously withdrawn had not been completely captured in regulations following the 2009 rulemaking."

The requirements of Section B.3.e from Order EA-02-026 have been captured in 10 CFR 73, Appendix B. In accordance with the NRC letter dated May 3, 2019, the requirements of B.3.e had been withdrawn from Order EA-02-026. Based on this information the commitment tracked under 1185143-01 can be removed from Procedure SY-AA-101-132.

In addition, Exelon Corporate and Information Security Services (CISS) performs training with company executives and those travelling internationally.

Attachment
Exelon Generation Company, LLC
2019 Corporate Regulatory Commitment Change Summary Report
Page 10 of 10

This commitment was the result of implementing requirements related to Section B.3.e of NRC Order EA-02-026, dated February 25, 2002. Subsequently, by letter dated May 3, 2019, the NRC provided notification that Section B.3.e of NRC Order EA-02-026 has been withdrawn and the respective requirements now reside in 10 CFR 73, Appendix B. Therefore, there is no adverse regulatory impact anticipated with deleting this commitment, since Section B.3.e of the Order has been withdrawn and the requirements are now included as part of NRC regulations and by definition would constitute being an "obligation."